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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

<p>NOVARTIS PHARMACEUTICALS CORPORATION, NOVARTIS CORPORATION, and NOVARTIS AG,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>WOCKHARDT USA LLC and WOCKHARDT LIMITED</p> <p style="text-align: center;">and</p> <p>SUN PHARMA GLOBAL FZE and SUN PHARMACEUTICAL INDUSTRIES LIMITED,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No.</p> <p>2:12-cv-03967-SDW-MCA</p> <p>[Consolidated with Civil Action Nos. 2:12-cv-04393, 2:13-cv-01028, 2:13-cv-02379, and 2:13-04669]</p> <p>MOTION DATE: November 4, 2013</p>
<p>NOVARTIS PHARMACEUTICALS CORPORATION,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ACCORD HEALTHCARE INC.; ACTAVIS LLC; APOTEX, INC.; APOTEX, CORP.; GLAND PHARMA LTD.; DR. REDDY'S LABORATORIES, INC.; DR. REDDY'S LABORATORIES LTD.; EMCURE PHARMACEUTICALS USA, INC.; EMCURE PHARMACEUTICALS, LTD; FRESENIUS KABI USA, LLC; HIKMA FARMACEUTICA S.A.; HOSPIRA, INC.; PHARMACEUTICS INTERNATIONAL INC.; SAGENT PHARMACEUTICALS, INC.; ACS DOBFAR INFO S.A.; STRIDES, INC.; AGILA SPECIALTIES PRIVATE LTD.; SUN PHARMA GLOBAL FZE; CARACO PHARMACEUTICAL LABORATORIES, LTD.; SUN PHARMACEUTICAL INDUSTRIES LTD.; USV NORTH AMERICA, INC.; WOCKHARDT USA LLC; and WOCKHARDT LTD.,</p> <p style="text-align: center;">Defendants.</p>	

NOVARTIS'S NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE that on November 4, 2013, or as soon as counsel can be heard, the undersigned counsel for Plaintiff Novartis Pharmaceuticals Corporation (“Novartis”) shall move pursuant to Local Civil Rule 5.3(c) before the Honorable Madeline Cox Arleo, U.S.M.J., at the United States District Court for the District of New Jersey, for an Order sealing the following documents [D.I. 181]:

- 1) Portions of Novartis’s Response to Certain Defendants’ Requests to Supplement Their Motions to Dismiss with an FDA Letter;
- 2) Portions of the Declaration of Robert W. Trenchard; and
- 3) Exhibits 3–4 to the Declaration of Robert W. Trenchard.

PLEASE TAKE FURTHER NOTICE that Plaintiff submits a publicly redacted version of Novartis’s Response to Certain Defendants’ Requests to Supplement Their Motions to Dismiss with an FDA Letter and the Declaration of Robert W. Trenchard.

PLEASE TAKE FURTHER NOTICE that Plaintiff submits the enclosed Memorandum in Support of this Motion to Seal, pursuant to Local Civil Rules 5.3(c)(1) and 7.1, and the Certification of Sean K. Thompson attesting to the good cause for an Order sealing the above-referenced documents.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion to Seal, Memorandum and Certification of Sean K. Thompson, and any additional submissions made hereafter, a proposed Order is also submitted.

Dated: October 4, 2013

s/ William J. O’Shaughnessy
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of the foregoing Notice of Motion to Seal and supporting documents were caused to be served on October 4, 2013 via the ECF system upon all counsel of record.

s/ William J. O'Shaughnessy

William J. O'Shaughnessy